

DANIEL G. BOGDEN  
United States Attorney  
District of Nevada  
HEATHER M. MOSS, DCBN 995773  
Assistant Regional Counsel  
160 Spear Street, Suite 800  
San Francisco, CA 94105  
Phone: 415-977-8826  
Fax: 415-744-0134  
Email: heather.moss@ssa.gov

Attorneys for Defendant

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

JANORA R. WINSOR,

Plaintiff,

v.

CAROLYN W. COLVIN,  
Acting Commissioner of Social Security,

Defendant.

Case No. 2:14-cv-00347-GMN-PAL

**UNOPPOSED MOTION FOR  
EXTENSION OF TIME  
(FIRST REQUEST)**

Defendant Carolyn W. Colvin, Acting Commissioner of Social Security ("Defendant") respectfully requests that the Court extend the time for Defendant to file her Cross-Motion to Affirm and Response to Plaintiff's Motion for Remand, due on September 29, 2014, by 30 days, through and including October 29, 2014. There is good cause for this request because agency counsel assigned to the case will be out of the country from September 12, 2014, through September 26, 2014. More time is necessary in order to responsibly research and brief this case. This request is made in good faith with no intention to unduly delay the proceedings. Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this motion, on September 10, 2014.

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1 Respectfully submitted this 10<sup>th</sup> day of September 2014.

2 DANIEL G. BOGDEN  
3 United States Attorney

4 /s/ Heather M. Moss  
5 HEATHER M. MOSS  
6 Assistant Regional Counsel

7 OF COUNSEL:

8 DONNA L. CALVERT  
9 Regional Chief Counsel, Region IX

10 IT IS SO ORDERED:

11   
12 UNITED STATES MAGISTRATE JUDGE

13 DATED: September 12, 2014  
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**CERTIFICATE OF SERVICE**

I, **Heather M. Moss**, certify that the following individual was served with a copy of the **UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date and via the method of service identified below:

**CM/ECF:**

Manuel Deeter Serpa  
Law Offices of Harry and Charles Binder, P.C.  
770 The City Drive South  
Orange, CA 92868  
714-564-8644  
Email: manuel.serpa@binderlawfirm.com

Hal Taylor  
223 Marsh Avenue  
Reno, NV 89509  
775-825-2223  
Fax: 775-329-1113  
Email: haltaylorlawyer@gbis.com

Dated this 10<sup>th</sup> day of September 2014.

/s/ Heather M. Moss  
HEATHER M. MOSS  
Assistant Regional Counsel